

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

JULIE A. SU,
Acting Secretary of Labor,
United States Department of Labor,

Plaintiff,

v.

UMR, INC.,

Defendant.

CIVIL ACTION NO. 3:23-CV-00513

District Judge William M. Conley

Magistrate Judge Anita M. Boor

**JOINT MOTION TO COORDINATE MOTIONS SEQUENCE AND
BRIEFING SCHEDULE FOR DISCOVERY MOTIONS**

Plaintiff Julie A. Su, Acting Secretary of Labor, U.S. Department of Labor (the “Acting Secretary”) and Defendant UMR, Inc. (“UMR”) hereby move to coordinate the briefing schedule on their pending and forthcoming motions regarding their discovery disputes. The parties jointly state that the following constitutes good cause for this Court to approve the stipulated schedule set forth below:

1. The parties are presently engaging in discovery. The parties disagree regarding the proper scope of discovery and the applicability of certain privileges asserted by the Acting Secretary. The parties have met and conferred but have been unable to resolve their dispute.
2. The parties have agreed to coordinate a motions sequence and briefing schedule that will advance this dispute towards a resolution from this Court in a manner that reduces duplicative briefing and is mutually amenable to the parties’ schedules (including a mediation regarding this case on September 25-26).

3. The parties have therefore agreed to the following motions sequence and briefing schedule:
 - a. Acting Secretary's Motion for a Protective Order: September 11, 2024.¹
 - b. UMR's Opposition to Acting Secretary's Motion and Cross-Motion to Compel: October 2, 2024.
 - c. Acting Secretary's Opposition to UMR's Motion to Compel: October 16, 2024.

Accordingly, for good cause shown, the parties respectfully request the Court approve this joint stipulation and enter the motions sequence and briefing schedule set forth above.

[signatures on following page]

¹ With UMR's agreement, the Acting Secretary filed her Motion for a Protective Order on September 11, 2024, after the parties agreed to the motions sequence and briefing schedule set forth herein, on the understanding that the parties would soon enter this joint stipulation.

Dated: September 12, 2024

For Defendant:

/s/ Geoffrey Sigler

GEOFFREY M. SIGLER (*pro hac vice*)

MATTHEW S. ROZEN (*pro hac vice*)

ANDREW G.I. KILBERG (*pro hac vice*)

Gibson, Dunn, Crutcher LLP

1050 Connecticut Ave. NW

Washington, DC 20036

Tel: 202-955-8500

gsigler@gibsondunn.com

mrozen@gibsondunn.com

akilberg@gibsondunn.com

KEVIN ST. JOHN

Bell Giftos St. John LLC

5325 Wall Street, Ste. 2200

Madison, WI 53718

Tel: 608-216-7990

kstjohn@bellgiftos.com

For the Acting Secretary:

SEEMA NANDA

Solicitor of Labor

CHRISTINE Z. HERI

Regional Solicitor

JEFFERY S. ROGOFF

Regional Solicitor

/s/ Rosemary Almonte

LYDIA J. FAKLIS

Office of the Solicitor

U.S. Department of Labor

230 S. Dearborn St., Ste. 844

Chicago, IL 60604

Tel: 312-353-7837

faklis.lydia.j@dol.gov

ROSEMARY ALMONTE

Office of the Solicitor

U.S. Department of Labor

201 Varick St., Ste. 983

New York, NY 10014

Tel: 646-264-3668

almonte.rosemary@dol.gov